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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
DOUGLAS KINSEY,	:
	:
Plaintiff,	:
	:
v.	:
	:
CENDANT CORPORATION, FAIRFIELD	:
RESORTS INC., and FFD DEVELOPMENT	:
COMPANY, L.L.C.,	:
	:
Defendants.	:
	:
-----X	

Document Electronically Filed
Case No. 1:04-cv-00582-RWS
(ECF CASE)

**NOTICE OF MOTION *IN LIMINE* TO EXCLUDE EVIDENCE
REGARDING MR. KELLER AND HIS STOCK OPTIONS, AND
KINSEY'S PURPORTED "DAMAGES" EVIDENCE**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Declaration of Samuel Kadet in Support of Defendant FFD Development Company, L.L.C.'s ("FFD") Motion In Limine, dated October 20, 2008, and the exhibits thereto, and upon all prior pleadings and proceedings herein, defendant FFD, by its undersigned counsel, will move in the United States District for the Southern District of New York, before the Honorable Robert W. Sweet, U.S.D.J., at the United States Courthouse, 500 Pearl Street, Courtroom 18C, New York, New York 10007-1581, on November 12, 2008 at 12:00 p.m., or on such other date set by

the Court, for an Order, pursuant to Fed. R. Evid. 402 and 403, precluding plaintiff Douglas Kinsey, at the trial of this action, from referring to and/or offering evidence regarding Mr. Keller and Mr. Keller's Cendant stock options, and Mr. Kinsey's subjective and speculative assertion regarding what he would have done had he known the actual expiration date of his Cendant stock options.

Dated: New York, New York
October 20, 2008

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

By: /s/ Samuel Kadet
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